

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 21-20063

v.

Hon. Laurie J. Michelson

KATELYN JONES,

Defendant.

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**MOTION TO EXTEND SURRENDER DATE**

NOW COMES Katelyn Jones, Defendant herein, by and through his attorney, Nancy L. McGunn, and hereby moves the Court for an extension of her surrender date for the following reasons:

1. Ms. Jones is currently scheduled to surrender on April 8, 2024, to FMC Carswell, in Fort Worth, Texas, in order to serve the 30-day sentence imposed by this Court.

2. Ms. Jones was on bond during the pendency of her case and has appeared at every hearing scheduled by this Court. She has significant health issues which have been detailed in the Presentence Report and in undersigned counsel's Sentencing Memorandum.

3. Ms. Jones' medication regimen was changed recently to add a new immunosuppressant medication, and she is being monitored by her physician to determine what impact, if any, the medication has had on her health conditions. She is scheduled for blood tests related to the medication change within the next month and a follow-up appointment with her physician will follow.

4. Ms. Jones respectfully asks the Court to adjourn her surrender date to July 8, 2024, in order to allow her to complete bloodwork and a follow-up with her physician to determine the efficacy of the new medication and to make any adjustments necessary. This will allow Ms. Jones to be stabilized on her new medication regimen prior to reporting to the Bureau of Prisons.

5. The Government has no objection to this request.

WHEREFORE, in light of all of the above, the Defendant respectfully requests this Court enter an Order adjourning the surrender date set in this case from April 8, 2024 until July 8, 2024.

Respectfully submitted,  
**FEDERAL DEFENDER OFFICE**

Dated: March 29, 2024

s/Nancy L. McGunn  
Nancy L. McGunn  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification to opposing counsel.

s/ Jennifer Mellas  
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Paralegal  
Federal Community Defender